

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No. 21-mj-113

MCKENZIE W. JOHNSON,

Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE,
SECTION 2251(a)

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

On or about January 13, 2021, in the Western District of Wisconsin, the
defendant,

MCKENZIE W. JOHNSON,

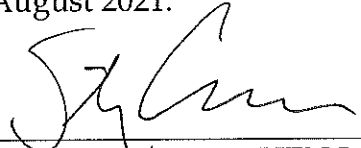
knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, JOHNSON used an Apple iPad, Model a2270, to produce a visual depiction, an image with a file name that ends in 1385.jpg, of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a).)

This complaint is based on the attached affidavit of Wade Beardsley.

WADE BEARDSLEY, Special Agent
Wisconsin Department of Justice,
Division of Criminal Investigation

Sworn to telephonically this 26th day of August 2021.



HONORABLE STEPHEN L. CROCKER

COUNTY OF DANE)
) ss
STATE OF WISCONSIN)

AFFIDAVIT

I, Wade Beardsley, being first duly sworn, state as follows:

1. I am a certified Wisconsin law enforcement officer employed as a sworn Special Agent with the Wisconsin Department of Justice - Division of Criminal Investigation (DCI). I have been a sworn law enforcement Officer in the State of Wisconsin since April 2011 and a Special Agent for DCI since March 2020. I am currently assigned to the Wisconsin Internet Crimes Against Children (ICAC) Taskforce, whose primary responsibility is the investigation of sexual crimes committed against children through the use of a computer and the Internet. I also investigated sexual crimes against children in my prior employment as a detective at the Eau Claire Police Department.

2. The facts in this affidavit come from my training and experience, my investigation, and information provided to me by other law enforcement officers. This affidavit does not contain every fact I know about this investigation but merely is intended to show probable cause that McKENZIE W. JOHNSON violated Title 18, United States Code, Section 2251(a).

3. On March 30, 2021, Fontana California Police Officer Mavil Padilla spoke to an adult in Fontana who reported that she caught her 13-year-old daughter, Minor A, date of birth having an on-line conversation with an adult male. Upon going through Minor A's laptop, the parent observed an email conversation between Minor A and a subject who identified himself as Sam Schumaker. As described below, Schumaker was later identified as the defendant, McKENZIE W. JOHNSON.

4. Officer Padilla spoke to Minor A who told him that she met JOHNSON on Omegle.com and that she had communicated with him for approximately two to three months using her school laptop. Minor A stated that she told JOHNSON that she was 13 years old and reported that within two to three weeks of meeting, she and JOHNSON transitioned to Zoom and email. Within three weeks of video chatting, JOHNSON asked Minor A if he could see her breasts and if she would dance for him. Minor A reported that she took off her shirt and danced for him two or three times. She also reported that JOHNSON exposed his penis to her.

5. Law enforcement determined that the subscriber of IP address registered to "Schumaker" at the time he was communicating with Minor A was McKENZIE W. JOHNSON,

6. On August 24, 2021, I participated in the execution of a search warrant at that address. JOHNSON was interviewed that same morning and admitted that he had created the alias of Sam Schumaker and that he had been communicating with Minor A. He said he initially thought she was a college student but learned that she was 14. After learning that, he continued communicating with her. He further said he would have Zoom sessions with Minor A where they would both masturbate and Minor A's breasts, vagina, and anus were exposed to the camera. He stated that he recorded some of these Zoom sessions with his iPad, and that there would be "lots" of images and videos he captured of Minor A over Zoom.

7. Among the items seized from JOHNSON's home was an Apple iPad, Model a2270. On August 25, 2021, I reviewed an image made from this iPad. On it, I found an image ending in 1385.JPG that was created by the iPad on January 13, 2021. The image

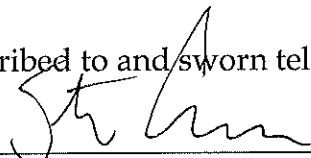
depicts a screen-capture of an Omegle video-chat. The area to the left on the image shows a nude black female lying on her back, visible from her knees to her buttocks, with her legs spread apart, exposing her vagina. She appears to be inserting a phallus-shaped object into her vagina. A backpack can be seen to the right of the child.

8. On that same date, I sent a heavily redacted version of the image to Minor A's mother, who identified the setting as being Minor A's bedroom and the backpack as belonging to Minor A.

9. I determined that the Apple iPad, Model a2270, was made in China.

WADE BEARDSLEY, Special Agent
Wisconsin Department of Justice,
Division of Criminal Investigation

Subscribed to and sworn telephonically this 26th day of August.



HONORABLE STEPHEN L. CROCKER
United States Magistrate Judge